

### REMARKS

The figures 36-39 have been objected to for not being properly marked as "Prior Art".

The specification has been objected to for having a misspelled word.

Claims 1, 6, and 12 have been rejected on the grounds of non-statutory obviousness-type double patenting as being unpatentable over claims 1-3, 9, 12, and 21 of U.S. Patent No. 6,745,208.

Claims 1-14 have been rejected under 35 U.S.C. §103(a) as being unpatentable over Applicant's admitted prior art ("APA") in view of U.S. Patent No. 6,792,431 to Tamboli et al. ("Tamboli").

Claims 1-14 remain pending.

#### Objection to the figures

The figures 36-39 have been objected to for not being properly marked as "Prior Art".

Figures 36-39 have been amended to include the identifier "Prior Art".

Applicant submits that this objection has now been overcome.

#### Objection to the Specification

The specification has been objected to for having a misspelled word.

The specification has been amended to replace the misspelled word "concerting" with the correct word "converting".

Applicant submits that this objection has now been overcome.

Rejection of claims 1-14 on the grounds of non-statutory obviousness-type double patenting

Claims 1, 6, and 12 have been rejected on the grounds of non-statutory obviousness-type double patenting as being unpatentable over claims 1-3, 9, 12, and 21 of U.S. Patent No. 6,745,208.

As cited, U.S. Patent No. 6,745,208 and the present application are commonly-owned by current assignee International Business Machines Corp. Applicant elects to postpone filing a terminal disclaimer until such time an indication of allowable subject matter has been received.

Rejection of Claims 1-14 under 35 U.S.C. §103(a)

With respect to independent claim 1, the Office Action states that the APA discloses all of Applicant's recited elements except an event generator for generating an event based on an update in said second model if said second model is updated based on an edit of said first model made by said editing module, which Tamboli allegedly discloses.

Tamboli teaches a method of creating a system implementing a dynamic common model for integrating data. The system includes a data integration application. The method includes developing a first adapter (or interface) for a first native repository. The first adapter is loosely coupled for data integration to the data integration application. The first native repository includes first native records having first native formats. The first native formats belong to categories of formats identified as datatypes. The method further includes developing a second adapter for a second native repository. The second adapter is loosely coupled for data integration to the data integration application. The second native repository includes second native records having second native formats. The second native formats belong to categories of formats identified as datatypes.

The method taught by Tamboli further includes creating mappings specifying transformations of records including: from the first native format to a first dynamic common format, from the first dynamic common format to the first native format, from the second native format to a second dynamic common format, and from the second dynamic common format to the second native format. The method further includes providing a transformation service capable of transforming formats in dependence upon the mappings. The transformation service is coupled for data communications to the first adapter and to the second adapter.

Tamboli further teaches that the data integration application is coupled for data communications to a multiplicity of native repositories through a multiplicity of adapters. The multiplicity of adapters includes the first adapter and the second adapter. All the adapters among the multiplicity of adapters are loosely coupled for data integration to the data integration application.

Tamboli still further teaches that the data integration application includes the transformation service, and the dynamic common format is a subset of a dynamic common model. The dynamic common model has the capability of specifying transformations to and from dynamic common format for all formats of records in all datatypes of the multiplicity of native repositories.

In contrast, Applicant's invention teaches an application editing apparatus for using a computer to edit an application having a model and a view separated from each other. The apparatus includes an editing module for editing a first model in the application, a model converter for converting the first model edited by the editing module into a second model, and a view display module for using a view of the second model to display the second model on a display device. The view display module includes an event generator for generating an event

based on an update in the second model if the second model is updated based on an edit of the first model made by the editing module and changes the view displayed on the display device based on the event generated by the event generator.

The Examiner cites col. 4, lines 15-26 as teaching an event generator for generating an event based on an update in said second model if said second model is updated based on an edit of said first model made by said editing module. Applicant submits that the cited passages have been misinterpreted.

The passages cited in Tamboli recite: "The dynamic common model itself comprises elements useful for automatically upgrading the dynamic common model to include changes in source repository structures. In fact, changes typically are administered in a similar manner as additions of new repositories. "Automatic upgrading" in this sense means that upon activation, a new adapter automatically registers itself and its new repository with a data integration application to which it is coupled for data communications and a spider then automatically enters in a catalog identifying information for all the records in the new repository served by the new adapter." These passages simply teach that the dynamic common model is updated when changes are made to a source repository. No event is generated in response to changes being made to a source repository. When a new repository is added, the associated adapter registers itself and the new repository with a coupled data integration application. Thereafter, a spider enters identifying information into a catalog. The adapter registration and spider entering identifying information are not a based on an edit made to a source repository.

In contrast, Applicant's event generator generates an event based on an update in the second (target) model if the second (target) model is updated based on an edit of the first (source) model made by the editing module, and changes the view displayed on the display

device based on the event generated by the event generator. Tamboli also does not teach or suggest changing a view displayed on a display device based on an event generated by an event generator.

In view of the foregoing, it is respectfully submitted that the APA and Tamboli, whether taken alone in combination, do not teach or suggest the subject matter recited in Applicant's independent claims 1 as these references fail at least to teach or suggest an application editing apparatus for using a computer to edit an application having a model and a view separated from each other. The apparatus includes an editing module for editing a first model in the application, a model converter for converting the first model edited by the editing module into a second model, and a view display module for using a view of the second model to display the second model on a display device. The view display module includes an event generator for generating an event based on an update in the second model if the second model is updated based on an edit of the first model made by the editing module and changes the view displayed on the display device based on the event generated by the event generator.

Independent claims 6, 11, and 12 recite features similar to those recited in claim 1, and therefore are patentably distinct over Tamboli for at least the reasons discussed in connection with independent claim 1.

Claims 2-5, 7-10, and 13-14, which depend directly from the independent claims 1, 6, and 12, incorporate all of the limitations the corresponding independent claim and are therefore patentably distinct over Tamboli for at least those reasons provided for claims 1, 6, and 12.

Conclusion

In view of the foregoing, Applicant respectfully requests reconsideration, withdrawal of all rejections, and allowance of all pending claims in due course.

Respectfully submitted,



Steven Fischman  
Registration No. 34,594

Scully, Scott, Murphy & Presser, P.C.  
400 Garden City Plaza, Suite 300  
Garden City, N.Y. 11530  
(516) 742-4343

SF/BMM:ej  
Enclosure: Replacement Sheets (36-39)